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Attorneys for Plaintiff KEB NY Financial Corp.

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

KEB NY Financial Corp.

Plaintiff,

٧.

Graceland Property LLC and Sun Hee Chun

Defendants.

Civil Action No. 1:10-cv-05911-PKC

## NOTICE OF MOTION FOR ENTRY OF DEFAULT JUDGMENT

PLEASE TAKE NOTICE that plaintiff, KEB NY Financial Corp. ("KEB" or "Plaintiff"), by its undersigned counsel, Duane Morris LLP, will hereby move before this Court, Hon. P. Kevin Castel, United States District Judge, for an order pursuant to Fed. R. Civ. P. 55(b) granting plaintiff's motion for entry of default judgment in plaintiff's favor against defendants Graceland Property LLC and Sun Hee Chun, individually.

PLEASE TAKE FURTHER NOTICE that Plaintiff shall rely upon the Complaint filed commencing the within action, the Declaration of T. Steven Har filed simultaneously herewith, the enclosed Clerk's Certificate, and the enclosed proof of service of the summons and complaint, in support of the within motion.

## PLEASE TAKE FURTHER NOTICE that a proposed form of default judgment has

been annexed hereto.

Dated: New York, New York December 20, 2010

DUANE MORRIS LLP Attorneys for Plaintiff, KEB NY Financial Corp.

By: <u>s/ T. Steven Har</u>
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To: Graceland Properties LLC 4111 West Manor Circle Memphis, TN 38116

> Sun Hee Chun 2704 Tall Pines Pine Hill, NJ 08021